

1. Considering that BPL deployments are already legal under Part 15 rules where BPL devices or their extended antenna systems can not interfere with licensed users, it is mandatory that any BPL interference to Amateur Radio or other licensed users be dealt with quickly.
2. The Amateur Radio users are by nature very frequency agile and their operation can involve simultaneous reception on more than one frequency band. The BPL interference mitigation system needs to be capable of eliminating interference simultaneously from any of the Amateur Radio bands.
3. Strict standards and measurement procedures need to be established so that BPL interference and mitigation can be gauged in a predictable and consistent manner.
4. When Amateur Radio operators register interference complaints, the mitigation must be available 24/7 and must be immediate because disasters are not predictable events and could happen at any time. Amateur Radio operators and other licensed users must have access to an up to date BPL data base with sufficient resolution so that individual BPL radiators can be easily identified. An accurate data base may allow new Amateur Radio installations to reduce or avoid interference.
5. As an active mobile HF Amateur Radio operator, I experience varying levels of man made noise as I drive. Since mobile operations are still licensed and need the same levels of protection from interference, there should be a specific BPL emission level that needs to be established and enforced. Mobile operators should have means to register their interference complaints while in motion using Cellular connectivity.
6. All BPL systems must be tested for rules compliance by an independent laboratory prior to initiation of service and at periodic intervals thereafter.
7. To ensure an informed marketplace, marketers of BPL services must give clear notice to consumers that all licensed radio services, including existing or subsequent Amateur Radio licensees nearby the consumer have priority and that the delivery of BPL services therefore cannot be guaranteed. Interference to the BPL system must be tolerated with no recourse and interference from the BPL system may require immediate termination or reduction in delivered services. Receipt of this notice must be highlighted and acknowledged in writing prior to the signing of any contract for service.
8. There must be severe financial and operational penalties for non-compliance with these rules.